

APPLICATION FOR REFERRAL OF CASE TO
THE COMPLEX LITIGATION DOCKET (CLD)

JD-CV-39 Rev. 4-13
Pr. Bk. Sec. 23-15, C.G.S. §§ 51-347b, 52-259

STATE OF CONNECTICUT
SUPERIOR COURT - CIVIL DIVISION

www.jud.ct.gov

COURT USE ONLY

CLDAPP



Instructions

1. Counsel and self-represented parties seeking to have a case referred to the Complex Litigation Docket (CLD) must supply all of the information requested below. (Failure to supply complete and accurate information may disqualify a case.)
2. **This application must be accompanied by the appropriate fee** (Section 52-259 of the Connecticut General Statutes).
3. Information that does not fit on this form should be attached on a separate sheet, numbered to correspond to the questions on the form.
4. Attorneys not excluded from e-filing must e-file this form and select "Complex Litigation Application" when naming the form in e-filing. Attorneys excluded from e-filing and self-represented parties must file the original with the appropriate fee with the Clerk in the judicial district in which the case is pending.

Note: Any objection to the transfer of this case to the CLD must be filed within 15 calendar days after the filing of this application. Attorneys not excluded from e-filing must select "Objection to Transfer to Complex Litigation" when naming the objection in e-filing. Attorneys excluded from e-filing and self-represented parties must file the objection with the Clerk in the judicial district in which the case is pending and must title it "Objection to Transfer to the Complex Litigation Docket."

The Judicial Branch of the State of Connecticut complies with the Americans with Disabilities Act (ADA). If you need a reasonable accommodation in accordance with the ADA, contact a court clerk or an ADA contact person listed at www.jud.ct.gov/ADA.

I submit this application for the Court's consideration.

Name and address of applicant Day Pitney LLP, 242 Trumbull Street, Hartford, CT 06103	Juris number 014229	Telephone number 860-275-0100
1. Case name (Plaintiff v. Defendant) Phillip Jack Brooks v. World Wrestling Entertainment, Inc.	2. Docket number FST-CV16-6029332-S	
3. Judicial District in which case is pending Stamford-Norwalk	4. Return date of original complaint 7/25/2016	

5. List all plaintiffs and their counsel:

Plaintiff's name	Counsel's name and address	Counsel's phone #
Phillip Jack Brooks	LeClair Ryan	203-672-3200
	545 Long Wharf Drive, Ninth Floor	
	New Haven, CT 06511	

6. List all defendants and their counsel:

Defendant's name	Counsel's name and address	Counsel's phone #
World Wrestling Entertainment, Inc.	Day Pitney LLP	860-275-0100
	242 Trumbull Street	
	Hartford, CT 06103	

7. Indicate whether opposing counsel opposes:

- | | | |
|--|-------------------------------------|--------------------------|
| | Yes | No |
| a. referral to the CLD..... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| b. transfer to the CLD location requested on this application... | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

8. Briefly describe the nature of the case: (products liability, anti-trust, stockholders' action, UCC, etc.)

Plaintiff has brought a complex application to enforce an expansive subpoena served on Defendant relating to an underlying litigation that is pending in Illinois state court.

9. List any cases with which this case is consolidated:

(Note: In order to apply for CLD in unconsolidated but related cases, a separate application with fee is required for each case.)

Case name (Plaintiff v. Defendant)	Docket number	Judicial District
None		

10. Indicate the status of the litigation:

- | | | |
|--|--------------------------|-------------------------------------|
| | Yes | No |
| a. pleadings closed..... | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| b. discovery completed..... | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| c. file sealed (partial/entire)..... | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| d. scheduled for trial — if so, when _____ | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| e. pretrial held..... (Date) _____ | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| f. trial management conference held..... | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

(Continued...)

	Yes	No	Not yet determined
g. claimed for jury trial.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
h. claimed for bench trial.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
i. class action status sought.....	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

11. Has a request or application to refer this case to the Complex Litigation Docket previously been denied? ☐ Yes ☒ No

12. What is the estimated length of trial (in days)? N/A

13. Why should this case be referred to the CLD ?

The anticipated complexity of the proceedings and the issues raised in the application make it suitable for the individualized attention and management provided by the CLD. This matter will require substantive knowledge of the underlying complex litigation that is pending in Illinois, raises important issues relating to the attorney-client privilege and work product protection, and presents novel issues of first impression regarding the interpretation and application of Connecticut General Statutes § 52-148e(f)(2) concerning the costs of compliance with a subpoena. This case also is likely to require continuing oversight and management of various discovery matters, including confidentiality and protective order issues and the conduct of depositions.

14. Which CLD location is requested? (Enter order of preference.)

2 Hartford 1 Stamford 3 Waterbury

Defendant requests the Stamford location because Plaintiff commenced this action in Stamford, Defendant is located in Stamford, and the Stamford location is more convenient for lead counsel for Defendant.

Certification

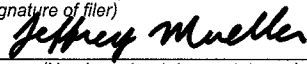
I certify that a copy of this document was mailed or delivered electronically or non-electronically on (date) 08/04/2016 to all attorneys and self-represented parties of record and that written consent for electronic delivery was received from all attorneys and self-represented parties receiving electronic delivery.

Name and address of each party and attorney that copy was mailed or delivered to*

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*If necessary, attach additional sheet or sheets with name and address which the copy was mailed or delivered to.

Signed (Signature of filer) 	Print or type name of person signing Jeffrey P. Mueller	Date signed 08/04/2016
Mailing address (Number, street, town, state and zip code) Day Pitney LLP, 242 Trumbull Street, Hartford, CT 06103		Telephone number 860-275-0100